

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

**In re: Asbestos Litigation  
Coordinated Docket**

ELIJAH SPARKMAN, JR.,

Plaintiff,

vs.

A. W. CHESTERTON COMPANY,  
BAYER CROPSCIENCE, INC., AS SUCCESSOR IN  
INTEREST TO Amchem Products, Inc.  
CRANE CO.,  
FOSTER WHEELER ENERGY CORPORATION,  
GOULDS PUMPS, INCORPORATED,  
IMO INDUSTRIES, INC.,  
INGERSOLL-RAND COMPANY,  
KADANT BLACK CLAWSON, INC.  
METROPOLITAN LIFE INSURANCE COMPANY,  
RESEARCH-COTTRELL, INC., n/k/a AWT Air  
Company, Inc.,  
RILEY POWER, INC.,  
STERLING FLUID SYSTEMS (USA) LLC  
TRANE U.S., INC., f/k/a American Standard, Inc.,  
UNIROYAL, INC.,

Defendants.

2:12-cv-02957-DCN

NOTICE OF REMOVAL

Bayer Cropscience, Inc. and Goulds Pumps, Inc., acting for themselves and the other proper defendants, would respectfully show unto the Court in support of their Notice of Removal:

1. Bayer Cropscience, Inc. and Goulds Pumps, Inc. are defendants in the above-entitled action.
2. The above-entitled action was instituted by the plaintiffs against Bayer Cropscience, Inc. and Goulds Pumps, Inc., as defendants, by the service of a Summons and Complaint on or about

September 14, 2012, and this action is now pending in the court of Common Pleas for Charleston County, South Carolina.

3. At the time of the commencement of the action, the plaintiffs were and still are citizens of the State of South Carolina, and Bayer Cropscience, Inc. and Goulds Pumps, Inc., as well as all of the other defendants herein, were at the time of the commencement of this action and still are corporations organized and existing under and by virtue of the laws of jurisdictions other than South Carolina and having their principal place of business in a jurisdiction other than South Carolina.

4. This action accordingly is of a civil nature and involves a controversy wholly between citizens of different states and the value of the matter in dispute in said cause exceeds the sum of Seventy-Five Thousand and no/100 Dollars (\$75,000.00), exclusive of interest and costs, as appears from the allegations contained in plaintiff's Complaint, and said action is one over which the District Court of the United States has original jurisdiction.

5. This action accordingly is of a civil nature and is one over which the District Court of the United States has original jurisdiction.

6. That filed herewith is a copy of all process, pleadings and orders served upon the defendants in this action.

7. That the Clerk of the Court of Common Pleas for Charleston County, South Carolina, has been provided a copy of this Notice of Removal.

8. All other proper defendants consent to the removal of the case.

HAYNSWORTH SINKLER BOYD, P.A.

By /s/ W. David Conner

Moffatt G. McDonald, #2805

[mmcdonald@hsblawfirm.com](mailto:mmcdonald@hsblawfirm.com)

W. David Conner, #05986

[dconner@hsblawfirm.com](mailto:dconner@hsblawfirm.com)

75 Beattie Place, 11<sup>th</sup> Floor

P.O. Box 2048

Greenville, SC 29602

(864) 240-3200

(864) 240-3300 (fax)

Attorneys for the Defendants Bayer Cropscience,  
Inc. and Goulds Pumps, Inc.

October 12, 2012

DEFENDANT DEMANDS JURY TRIAL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Removal was mailed to the following this 15th day of October, 2012:

V. BRIAN BEVON  
MOTLEY RICE LLP  
P. O. Box 1792  
MT. PLEASANT, SC 29465  
*Attorneys for Plaintiffs*

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/s/ W. David Conner